

# Exhibit E



**OFFICE OF THE STATE'S ATTORNEY**  
COOK COUNTY, ILLINOIS

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October 3, 2014

Ms. Alexandra Lampert  
Neufeld, Scheck & Brustein, LLP  
99 Hudson Street, 8<sup>th</sup> Floor  
New York, New York 10013

Re: Saunders v. City of Chicago, et al.  
Court No. 12 C 9158

Dear Counsel:

Pursuant to your subpoena in the above-captioned matter, the Cook County State's Attorney's Office responds as follows:

- 1) Objection as overbroad, unduly burdensome, irrelevant under FRE 401, 402, 403, 404, 407, 408, and 501. Notwithstanding this objection, none. Further, any documents for the time period from when either Fabio Valentini or Terence Johnson was a Supervisor in the Felony Review Unit, are irrelevant and inadmissible.
- 2) Objection as overbroad, unduly burdensome, irrelevant under FRE 401, 402, 403, 404, 407, 408, and 501. Notwithstanding this objection, none. Investigation continues. Further, any documents for the time period from when either Fabio Valentini or Terence Johnson was a Supervisor in the Felony Review Unit, are irrelevant and inadmissible.
- 3) Objection as overbroad, unduly burdensome, irrelevant under FRE 401, 402, 403, 404, 407, 408, and 501. Notwithstanding this objection, none. Further, any documents for the time period from when either Fabio Valentini or Terence Johnson was a Supervisor in the Felony Review Unit, are irrelevant and inadmissible.
- 4) Objection as overbroad, unduly burdensome, irrelevant under FRE 401, 402, 403, 404, 407, 408, and 501. Notwithstanding this objection, none.

- 5) Objection as overbroad, unduly burdensome, irrelevant under FRE 401, 402, 403, 404, 407, 408, and 501. Notwithstanding this objection, none.
- 6) See documents produced responsive to discovery requests.
- 7) See documents produced responsive to discovery requests.
- 8) See documents produced bates numbered SAO 06264-06415.
- 9) Objection as overbroad, unduly burdensome, irrelevant under FRE 401, 402, 403, 404, 407, 408, and 501. Notwithstanding this objection, see documents produced responsive to discovery requests.
- 10) Objection as overbroad, unduly burdensome, irrelevant under FRE 401, 402, 403, 404, 407, 408, and 501. Notwithstanding this objection, none.
- 11) Objection as overbroad, unduly burdensome, irrelevant under FRE 401, 402, 403, 404, 407, 408, and 501. Notwithstanding this objection, none at this time. Investigation continues.
- 12) None. Upon information and belief, the head of Felony Review in March 1995 was Chuck Burns.
- 13) None. Upon information and belief, the immediate supervisor of Terence Johnson and Fabio Valentini in March 1995 were John Dillon and Tom Reich.
- 14) None.
- 15) Defendant is prohibited from production of a “personnel file” pursuant to the Illinois Personnel Records Review Act. Further, the request seeks information which Defendant is prohibited from disclosing pursuant to the Health Insurance Portability and Accountability Act, 45 CFR §164.512.
- 16) Objection as overbroad, unduly burdensome, irrelevant under FRE 401, 402, 403, 404, 407, 408, and 501.

Sincerely,

/s/ Lisa M. Meador

Lisa M. Meador  
Assistant State's Attorney